

# **EXHIBIT E**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JULIE AVERBACH FOR THE ESTATE OF :  
STEVEN AVERBACH, *et al.*, :

Plaintiffs, :

-against- :

CAIRO AMMAN BANK, :

Defendant. :  
-----X

**No. 19-cv-00004-GHW-KHP**

**PLAINTIFFS' SECOND REQUEST FOR THE  
PRODUCTION OF DOCUMENTS BY DEFENDANT CAIRO AMMAN BANK**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs hereby request that defendant Cairo Amman Bank ("Cairo Amman Bank" or "Defendant") in the above-captioned litigation produce and permit Plaintiffs to inspect and copy all of the following Documents and things which are in the possession, custody or control of Defendant, and/or Defendant's agents or attorneys, within thirty (30) days following the date of service of these requests.

**DEFINITIONS**

1. As used herein, the following terms are defined as indicated:

- a. "All/Each" is synonymous with the definition contained in Local Rule 26.3(d) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the "Local Rules").
- b. "Concerning" is synonymous with the definition contained in Local Rule 26.3(c)(7).
- c. "Document" is synonymous in meaning and equal in scope to the usage of the term "documents or electronically stored information" in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate Document within the meaning of this term.
- d. "You" and "Your" refer to Defendant and its directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, or investigators, or its attorneys or their agents, employees, representatives or investigators.

### **INSTRUCTIONS**

1. You are to furnish all responsive Documents or things in Your possession, custody, or control, regardless of whether such Documents are in the possession, custody, or control of You or Your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, or investigators, or by Your attorneys or their agents, employees, representatives, or investigators.
2. All requested Documents must be produced in full. If any requested Document or thing cannot be produced in full, You are to produce it to the extent possible, indicating which Document, or portion of such Document, is being withheld, and the reason that Document is being withheld.
3. All Documents shall be produced in the same order as they are kept or maintained by You in the ordinary course of Your business.
4. Documents attached to each other should not be separated.
5. If a Document once existed and has subsequently been lost, destroyed, or is otherwise missing, please provide sufficient information to identify the Document and state the details concerning its loss.
6. If You claim the attorney-client privilege or any other privilege or work product protection for any Document, You shall provide a detailed privilege log that contains at least the information required by Local Rule 26.2(a)(2)(A) for each Document that You have withheld.

### **DOCUMENTS REQUESTED**

1. All Documents Concerning the three Holy Land Foundation accounts referenced and identified in the deposition testimony of Khalid Al-Qassem on December 5, 2022.

Date: December 7, 2022

By: /s/ Michael J. Radine  
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